

Gregory Grigoryants (SBN 286804)
GREGORY GRIGORYANTS, ATTORNEY AT LAW
9350 Wilshire Blvd, Suite 203
Beverly Hills, CA 90212
Phone: (424) 248-7237
Fax: (424) 258-9473
Email: gregory@grigoryantslaw.com
Attorney for Plaintiff

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION**

In re: MOHSIN M BHOJANI, Debtor,	Chapter 7 Case No.: 2:24-bk-12418-BR Adv. No.: 2:24-ap-01258-BR
MOHSIN M BHOJANI, Plaintiff, vs. U.S. DEPARTMENT OF EDUCATION, Defendant.	STIPULATION TO DISMISS ADVERSARY PROCEEDING Continued Status Conference: Date: 7/15/2025 Time: 10:00 AM Courtroom: 1668 Place: 255 E. Temple St., 16th Floor, Los Angeles, CA 90012

**TO THE HONORABLE BARRY RUSSELL, UNITED STATES BANKRUPTCY
JUDGE:**

Plaintiff and Debtor Mohsin Bhojani (“Plaintiff” or “Debtor”) and defendant United States Department of Education (“Defendant”), by and through their respective counsel of record (“Party” or “Parties”), hereby enter into this stipulation to dismiss this Adversary Proceeding with reference to the following facts and subject to Bankruptcy Court approval:

I. RECITALS

1. Debtor filed for bankruptcy protection under Chapter 7 on March 29, 2024.
2. Debtor filed this adversary proceeding (the “Adversary Proceeding”) against Defendant on November 6, 2024, for a hardship discharge of his student loans.
3. On December 3, 2024, Defendant timely filed an Answer.
4. On January 3, 2025, Debtor received an email message from his student loans’ servicer Nelnet (“Nelnet”) advising that Debtor’s application for a Total and Permanent Disability (“TPD”) discharge had been approved by Defendant.
5. On May 6, 2025, Defendant provided Debtor with a TPD discharge confirmation letter.
6. Plaintiff has agreed to dismiss the Adversary Proceeding, thereby concluding the Adversary Proceeding in its entirety, because the merits of the Adversary Proceeding have been resolved through the TPD discharge.

II. STIPULATION

NOW, THEREFORE, in consideration of the foregoing:

1. The Recitals set forth above are hereby incorporated into the Stipulation by this reference.
2. Pursuant to Federal Rule of Bankruptcy Procedure 7041 and Federal Rule of Civil Procedure 41(a)(2), the Parties stipulate to dismiss this Adversary Proceeding in its entirety.
3. Each Party shall bear their own attorney’s fees, cost and expenses.

[SIGNATURES ON THE NEXT PAGE]

1 Dated: May 27, 2025

/s/ Gregory Grigoryants
GREGORY GRIGORYANTS,
Attorney for Plaintiff

2
3
4 Dated: May 27, 2025

BILAL A. ESSAYLI
United States Attorney
DAVID M. HARRIS
Assistant United States Attorney
Chief, Civil Division
JOLENE TANNER
Assistant United States Attorney
Chief, Tax and Bankruptcy Section

5
6
7
8
9
10
11
12 Elan S. Levey
ELAN S. LEVEY
Assistant United States Attorney

13
14 Attorney for Defendant, U.S. Department of
15 Education
16
17
18
19
20
21
22
23
24
25
26
27
28